



## Filing Receipt

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**PROJECT NO. 51840**

<b>RULEMAKING TO ESTABLISH</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ELECTRIC WEATHERIZATION</b>	<b>§</b>	
<b>STANDARDS</b>	<b>§</b>	<b>OF TEXAS</b>

**TEXAS SOLAR POWER ASSOCIATION’S RESPONSE TO THE PROPOSAL FOR PUBLICATION**

The Texas Solar Power Association (“TSPA”) is a statewide industry trade association that promotes the development of solar electric generation. Our member companies invest in the development of solar photovoltaic products and projects in Texas, serving customers in both wholesale and retail markets, with products ranging from utility-scale generation, community solar and customer-sited solar and storage solutions.

TSPA appreciates the Commission’s responsiveness to stakeholders in this rulemaking. As such, we have only two brief comments.

**§25.55(c) Phase one weather emergency preparedness reliability standards for a generation entity**

Paragraph (1)(b) requires windbreaks for generators “susceptible to outages or derates caused by wind.” This requirement is still vague. TSPA interprets susceptible in this context as relating to a generator that has previously had documented wind issues. Windbreaks at solar generation facilities could be a large investment to protect individual panels or areas and generally are not necessary. Alternatively, the Commission could set a deration percentage or MW size at risk, and seek comment on the standard.

**§25.55 (e) Weather-related failures by a generation entity to provide service**

This Section proposes that the commission will impose an administrative penalty on a generation entity that has violated weatherization requirements and does not cure the violation within a “reasonable period of time.”

As stated in our response to the strawman; Given the very high penalties associated with weatherization, TSPA continues to respectfully request that the Commission provide more detail as to what a reasonable period of time is to cure a violation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Charlie Hemmeline', positioned above a horizontal line.

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Texas Solar Power Association